

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:

Superior Aluminum Alloys
New Haven, Indiana, et al.

Respondent.

) Docket No. **CAA-05- 2003-0 011**
)
) **Consent Agreement and Final**
) **Order**
)
)
)

CONSENT AGREEMENT AND FINAL ORDER

I. JURISDICTIONAL AUTHORITY

1. This is a civil administrative action instituted pursuant to Section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), and Sections 22.1(a)(2), 22.13(b), and 22.34 of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits," 40 C.F.R. Part 22 (the Consolidated Rules).

2. Section 22.13(b) of the Consolidated Rules provides that where the parties agree to settlement of one or more causes of action before the filing of a complaint, a proceeding may be simultaneously commenced and concluded by the issuance of a Consent Agreement and Final Order (CAFO).

3. Complainant is, by lawful delegation, the Director of the Air and Radiation Division, U.S. EPA, Region 5.

03 AUG -6 PM 2:53

RECEIVED
REGIONAL HEARINGS

4. Respondent is Superior Aluminum Alloys (Superior), which is and was at all times relevant to this CAFO, a limited liability company operating under the laws of the State of Indiana and with a place of business at 14214 Edgerton Road, New Haven, Indiana, 46774.

II. REGULATORY BACKGROUND

5. Section 114 of the Act, 42 U.S.C. § 7414, provides that the Administrator (or delegated authority) may require that any person who owns or operates an emission source, on a one-time, periodic or continuous basis, provide information which the Administrator may reasonably require to carry out any provision of the Act.

6. Pursuant to 40 C.F.R. § 63.1500, the National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements at Subpart RRR apply to the owner or operator of each secondary aluminum production facility (secondary aluminum production NESHAP).

7. Pursuant to 40 C.F.R. § 63.1501 (b), the owner or operator of a new affected source that commences construction or reconstruction after February 11, 1999, must comply with the requirements of subpart RRR by March 23, 2000, or upon startup, whichever is later.

8. Pursuant to 40 C.F.R. § 63.1506(a)(1), on and after the date on which the initial performance test is conducted or

required to be conducted, whichever date is earlier, the owner or operator must operate all new and existing affected sources and control equipment according to the requirements in this section.

9. Pursuant to 40 C.F.R. § 63.1510(a), on and after the date the initial performance test is completed or required to be completed, whichever date is earlier, the owner or operator of a new or existing affected source or emission unit must monitor all control equipment and processes according to the requirements in this section.

10. Pursuant to 40 C.F.R. § 63.1510(i), the following requirements apply to the owner or operator of an affected source or emission unit using a lime-injected fabric filter to comply with the requirements of this subpart:

(1) The owner or operator of a continuous lime injection system must verify that lime is always free-flowing by either:

(i) Inspecting each feed hopper or silo at least once each 8-hour period and recording the results of each inspection. If lime is found not to be free-flowing during any of the 8-hour periods, the owner or operator must increase the frequency of inspections to at least once every 4-hour period for the next 3 days. The owner or operator may return to inspections at least once every 8 hour

period if corrective action results in no further blockages of lime during the 3-day period; or

(ii) Subject to the approval of the permitting agency, installing, operating and maintaining a load cell, carrier gas/lime flow indicator, carrier gas pressure drop measurement system or other system to confirm that lime is free-flowing. If lime is found not to be free-flowing, the owner or operator must promptly initiate and complete corrective action, or

(iii) Subject to the approval of the permitting agency, installing, operating and maintaining a device to monitor the concentration of HCl at the outlet of the fabric filter. If an increase in the concentration of HCl indicates that the lime is not free-flowing, the owner or operator must promptly initiate and complete corrective action.

(2) The owner or operator of a continuous lime injection system must record the lime feeder setting once each day of operation.

11. Pursuant to 40 C.F.R. §63.1510(j), The owner or operator must install, calibrate, operate and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected into each emission unit.

12. Pursuant to 40 C.F.R. § 63.1515(b), each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in § 63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in paragraphs (a)(1) through (10) of this section.

13. Pursuant to 40 C.F.R. § 63.1517(a), as required by § 63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.

14. Pursuant to 40 C.F.R. § 63.1517(b), in addition to the general records required by § 63.10(b), the owner or operator of a new or existing affected source (including an emission unit in a secondary aluminum processing unit) must maintain certain records.

15. U.S. EPA promulgated final interim approval of the Indiana Title V program on November 14, 1995 (60 Fed. Reg. 57188), and the program became effective on December 14, 1995 (Part 70 program).

16. U.S. EPA promulgated the Part 70 permit program regulations under the authority of Section 502 of the Act, 42 U.S.C. § 7761a. The regulation at 40 C.F.R. § 70.6(b)(1) specifies that all terms and conditions in a permit issued under

a Part 70 program, including any provisions designed to limit a source's potential to emit, are enforceable by the U.S. EPA under the Act.

17. The Administrator of U.S. EPA (the Administrator) may assess a civil penalty of up to \$27,500 per day of violation up to a total of \$220,000 for violations of the Act that occurred on or after January 31, 1997, under Section 113(d)(1) of the Act, 42 U.S.C. § 7413(d)(1), and 40 C.F.R. Part 19.

18. Section 113(d)(1) limits the Administrator's authority to matters where the first alleged date of violation occurred no more than 12 months prior to initiation of the administrative action, except where the Administrator and Attorney General of the United States jointly determine that a matter involving a longer period of violation is appropriate for an administrative penalty action.

19. The Administrator and the Attorney General of the United States, each through their respective delegates, have determined jointly that an administrative penalty action is appropriate for the period of violations alleged in this complaint and the August 27, 2002 Finding of Violation, No. EPA-5-02-IN-18 (FOV).

III. STIPULATED FACTS

20. Superior is a "person" as defined at Section 302(e) of the Clean Air Act, 42 U.S.C. § 7602(e).

21. Superior owns and operates a secondary aluminum facility at 14214 Edgerton Road, New Haven, Indiana (the facility).

22. Superior owns and operates three reverberatory furnaces which are controlled by lime injected fabric filter baghouses.

23. Superior began operating furnace #1 in November 2001.

24. Superior began operating furnace #2 in February 2002.

25. Superior began operating furnace #3 in August 2000.

26. The Superior facility is an emission source subject to the requirements of the Act, including Section 114 of the Act, 42 U.S.C. § 7414, 40 C.F.R. Part 63, Subpart RRR, and any applicable requirements of the federally-approved Indiana State Implementation Plan (SIP).

27. Superior is subject to the conditions of its Indiana source modification permits 003-11927-00286 and 003-14739-00286, and Part 70 operating permit number T003-11452-00286.

28. On May 2, 2002, U.S. EPA issued a Request for Information to Superior pursuant to Section 114 of the Act, 42 U.S.C. § 7414. The Request for Information required Superior to conduct volatile organic material (VOM) capture and destruction efficiency testing to determine whether the facility's dryer operation is in compliance with the Indiana operating permit and Title V permit by July 19, 2002.

29. Superior failed to conduct the testing at its facility by July 19, 2002, in violation of 42 U.S.C. § 7414.

30. Superior began operation of furnace 3 in August 2000. Superior performed the initial performance test on June 1, 2001.

31. Superior has not performed inspections once per 8-hr shift of the continuous lime injection system for furnace 3 in violation of 40 C.F.R. § 63.1510(i)(1), Condition D.1.12(b) of its Title V Permit and Condition D.1.7(6) and (7) of its Indiana Source Modification Permit 003-11927-00286.

32. Superior has not installed a device to continuously measure and record the weight of gaseous or liquid reactive flux injected into furnace 3 in violation of 40 C.F.R. § 63.1510(j), Condition D.1.12 of its Title V Permit and Condition D.1.7(4) of its Indiana Source Modification Permit 003-11927-00286.

33. Superior has failed to submit a compliance status report for furnaces 1 through 3 in violation of 40 C.F.R. § 63.1515(b), Condition D.1.25 of its Title V Permit, Condition D.1.13(2) for furnace 3 of its Indiana Source Modification Permit 003-11927-00286, and Condition D.1.25(b) for furnaces 1 and 2 of its Indiana Source Modification Permit 003-14739-00286.

34. Superior has failed to maintain records of 15-minute block average weights of gaseous or liquid flux and records of monthly label inspections required under 40 C.F.R. § 63.1517 and in violation of 40 C.F.R. § 63.1517(a) and (b), Condition D.1.24 of its Title V Permit, Condition D.1.13 for furnace 3 of its Indiana Source Modification Permit 003-11927-00286, and Condition

D.1.25 for furnaces 1 and 2 of its Indiana Source Modification Permit 003-14739-00286.

35. Superior began operating furnace 3 in August 2000. Superior performed the initial performance test June 1, 2001 violating permit condition D.1.9 of its Title V Permit which required that Superior test furnace 3 within 180 days of startup.

IV. TERMS OF SETTLEMENT

36. The parties agree that settling this action is in the public interest, that the entry of this CAFO without the filing of a Complaint or engaging in further litigation is the most appropriate means of resolving this matter, and that the purpose of this CAFO is to ensure compliance with the Act, Sections 112, 113 and 114 of the Act, 42 U.S.C. §§ 7412, 7413, and 7414, and the terms of this CAFO;

NOW, THEREFORE, before the taking of any testimony, upon the alleged violations, without adjudication of any issue of fact or law, and upon consent and agreement of the parties, it is hereby ordered and adjudged as follows:

37. This settlement is pursuant to, and in accordance with, 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3).

38. Superior admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations.

39. Superior consents to the issuance of this CAFO, the assessment of a civil penalty and the performance of a

Supplemental Environmental Project (SEP), as outlined in Section VII of this CAFO.

40. Superior consents to all of the conditions in this CAFO.

41. Superior waives its right to a hearing as provided at 40 C.F.R. § 22.15(c).

42. Superior waives its right to contest the allegations in this CAFO, and waives its right to appeal under Section 113(d) of the Act, 42 U.S.C. § 7413(d).

43. To the best of its knowledge, Superior certifies that it is complying fully with secondary aluminum production NESHAP and Section 114 of the Clean Air Act.

44. This CAFO constitutes a settlement by U.S. EPA of all claims for civil penalties pursuant to Sections 112, 113 and 114 of the Act, 42 U.S.C. §§ 7412, 7413 and 7414, for the violations alleged in the FOV and Section III of this CAFO. Nothing in this CAFO is intended to, nor shall be construed to, operate in any way to resolve any criminal liability of Superior arising from the violations alleged in this CAFO or liability related to violations of the Act. Compliance with this CAFO shall not be a defense to any other actions subsequently commenced pursuant to Federal laws and regulations administered by U.S. EPA, and it is the responsibility of Superior to comply with such laws and regulations.

45. Each undersigned representative of the parties to this CAFO certifies that he or she is fully authorized by the party represented to enter into the terms and conditions of this CAFO and to execute and legally bind that party to it.

46. Each party shall bear its own costs and attorneys' fees in connection with the action resolved by this CAFO.

47. This CAFO shall become effective on the date it is filed with the Regional Hearing Clerk, Region 5.

48. "Parties" shall mean U.S. EPA and Superior.

V. CIVIL PENALTY

49. Pursuant to Section 113(e) of the Act, 42 U.S.C. § 7413(e), in determining the amount of the penalty assessed, U.S. EPA took into account (in addition to such other factors as justice may require), the size of Superior's business, the economic impact of the penalty on Superior's business, Superior's full compliance history and good faith efforts to comply, the duration of the violations, the economic benefit of noncompliance, and the seriousness of the violations. Based on an analysis of the above factors, including, Superior's cooperation, and agreement to perform a SEP, U.S. EPA has determined that an appropriate civil penalty to settle this action is Thirty-Three Thousand Five Hundred and Fifty Dollars (\$33,550).

50. Superior must pay the \$33,550 civil penalty by

cashier's or certified check payable to the "Treasurer, United States of America."

51. Superior must send the check to:

U.S. Environmental Protection Agency
Region 5
P.O. Box 70753
Chicago, Illinois 60673

52. A transmittal letter, stating Respondent's name, complete address, the case docket number, and the billing document number must accompany the payment. Respondent must write the case docket number and the billing document number on the face of the check. Respondent must send copies of the check and transmittal letter to:

Attn: Regional Hearing Clerk, (E-19J)
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Attn: Compliance Tracker, (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

Cynthia A. King, (C-14J)
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3509

53. This civil penalty is not deductible for federal tax purposes.

54. If Superior does not pay timely the civil penalty, or any stipulated penalties due under paragraph 67, below, U.S. EPA may bring an action to collect any unpaid portion of the penalty with interest, handling charges, nonpayment penalties and the United States' enforcement expenses for the collection action under Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5). The validity, amount and appropriateness of the civil penalty are not reviewable in a collection action.

55. Interest will accrue on any overdue amount from the date payment was due at a rate established under 31 U.S.C. § 3717. Superior will pay a \$15 handling charge each month that any portion of the penalty is more than 30 days past due. Superior will pay a quarterly nonpayment penalty each quarter during which the assessed penalty is overdue according to Section 113(d)(5) of the Act, 42 U.S.C. § 7413(d)(5). This nonpayment penalty will be 10 percent of the aggregate amount of the outstanding penalties and nonpayment penalties accrued from the beginning of the quarter.

VII. SUPPLEMENTAL ENVIRONMENTAL PROJECT

56. Superior has agreed to complete the following SEP: the installation of a recuperator at its scrap dryer that will result in the reduction of nitrogen oxides emissions and natural gas usage. A detailed Scope of Work is provided as Attachment A to this CAFO.

57. Superior must spend at least \$100,650 in the performance of this SEP.

58. Superior must ensure that the SEP is implemented within one year and the SEP must be operated for two years.

59. Superior certifies that it is not required to perform or develop the SEP by any law, regulation, grant, order, or agreement, or as injunctive relief as of the date it signs this CAFO. Superior further certifies that it has not received, and is not negotiating to receive, credit for the SEP in any other enforcement action.

60. Superior must maintain copies of the underlying research and data for all reports submitted to U.S. EPA according to this CAFO. Superior must provide the documentation of any underlying research and data to U.S. EPA within fourteen days of receipt of U.S. EPA's request for the information.

61. Superior shall submit annual reports to U.S. EPA describing the status of the SEP requirements, beginning January 1, 2004.

62. Superior must submit a SEP completion report to U.S. EPA within 60 days of the full implementation of the SEP. This report must contain the following information:

- a. detailed description of the SEP as completed;
- b. description of any operating problems and the actions taken to correct the problems;
- c. itemized costs of goods and services used to

complete the SEP documented by copies of invoices, purchase orders, or canceled checks that specifically identify and itemize the individual costs of the goods and services;

d. certification that Superior has completed the SEP in compliance with this CAFO; and

e. description of the environmental and public health benefits resulting from the SEP (quantify the benefits and pollution reductions, if feasible).

63. Superior must submit all notices and reports required by this CAFO by first class mail to:

Attn: Compliance Tracker (AE-17J)
Air Enforcement and Compliance Assurance Branch
Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604-3590

64. In each report that Superior submits as provided by this CAFO, it must certify that the report is true and complete by including the following statement signed by one of its officers:

I certify that I am familiar with the information in this document and that, based on my inquiry of those individuals responsible for obtaining the information, the information is true and complete to the best of my knowledge. I know that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

65. Following receipt of the SEP completion report described in paragraph 62 above, U.S. EPA must notify Superior in writing that:

a. It has satisfactorily completed the SEP and the SEP report;

b. There are deficiencies in the SEP as completed or in the SEP report and U.S. EPA will give Superior 30 days to correct the deficiencies; or

c. It has not satisfactorily completed the SEP or the SEP report and U.S. EPA will seek stipulated penalties under paragraph 67.

66. If U.S. EPA exercises option b. above, Superior may object in writing to the deficiency notice within 10 days of receiving the notice. The parties will have 30 days from U.S. EPA's receipt of Superior's objection to reach an agreement. If the parties cannot reach an agreement, U.S. EPA will give Superior a written decision on its objection. Superior will comply with any requirements that U.S. EPA imposes in its decision. If Superior does not complete the SEP as required by U.S. EPA's decision, Superior will pay stipulated penalties to the United States under paragraph 67 below.

67. If Superior violates any requirement of this CAFO relating to the SEP, Superior must pay stipulated penalties to the United States as follows:

a. Except as provided in subparagraph b, below, if Superior did not complete the SEP satisfactorily according to this CAFO, Superior must pay a stipulated penalty of \$100,650.

b. If Superior did not complete the SEP satisfactorily, but U.S. EPA determines that Superior: (i) made good faith and timely efforts to complete the SEP; and (ii) certified, with supporting documents, that it spent at least 90 percent of the required amount on the SEP, Superior will not be liable for any stipulated penalty.

c. If Superior satisfactorily completed the SEP, but

spent less than 90 percent of the required amount on the SEP, Superior must pay a stipulated penalty of \$10,065.

d. If Superior failed to submit timely the SEP completion report required by paragraph 62 above, Superior must pay a stipulated penalty of \$100 for each day after the report was due until it submits the report.

e. If Superior failed to submit timely any other report required by paragraph 61 above, Superior must pay a stipulated penalty of \$100 for each day after the report was due until it submits the report.

68. U.S. EPA's determinations of whether Superior satisfactorily completed the SEP and whether it made good faith, timely efforts to complete the SEP will bind Superior.

69. Superior must pay any stipulated penalties within 15 days of receiving U.S. EPA's written demand for the penalties. Superior will use the method of payment specified in paragraphs 51 and 52, above, and will pay interest, handling charges, and nonpayment penalties on any overdue amounts.

70. Any public statement that Superior makes referring to the SEP must include the following or substantially equivalent language, "Superior undertook this project under the settlement of the United States Environmental Protection Agency's enforcement action against Superior for alleged violations of the Clean Air Act at its New Haven, Indiana facility."

71. If an event occurs which causes or may cause a delay in completing the SEP as required by this CAFO:

a. Superior must notify U.S. EPA in writing within 14

days after learning of an event which caused or may cause a delay in completing the SEP. The notice must describe the anticipated length of the delay, its cause(s), Superior's past and proposed actions to prevent or minimize the delay, and a schedule to carry out those actions. Superior must take all reasonable actions to avoid or minimize any delay. If Superior fails to notify U.S. EPA according to this paragraph, Superior will not receive an extension of time to complete the SEP.

b. If the parties agree that circumstances beyond the control of Superior caused or may cause a delay in completing the SEP, the parties will stipulate to an extension of time no longer than the period of delay.

c. If U.S. EPA does not agree that circumstances beyond the control of Superior caused or may cause a delay in completing the SEP, U.S. EPA will notify Superior in writing of its decision and any delays in completing the SEP will not be excused.

d. Superior has the burden of proving that circumstances beyond its control caused or may cause a delay in completing the SEP. Increased costs for completing the SEP will not be a basis for an extension of time under subparagraph b, above. Delay in achieving an interim step will not necessarily justify or excuse delay in achieving subsequent steps.

VIII. GENERAL PROVISIONS

72. This CAFO settles U.S. EPA's claims for civil penalties for the violations alleged in Section III of this CAFO. Full payment of the penalty identified in Paragraph 49 and completion of the SEP described in Paragraphs 56 through 71 shall resolve Superior's liability for these alleged violations and facts.

73. Nothing in this CAFO restricts U.S. EPA's authority to seek Superior's compliance with the Act and other applicable laws and regulations.

74. This CAFO does not affect Superior's responsibility to comply with the Act and other applicable federal, state and local laws, and regulations.

75. This CAFO constitutes an "enforcement response" as that term is used in "U.S. EPA's Clean Air Act Stationary Source Civil Penalty Policy" to determine Superior's "full compliance history" under Section 113(e) of the Act, 42 U.S.C. § 7413(e).


76. The terms of this CAFO bind the parties, and their successors, and assigns.

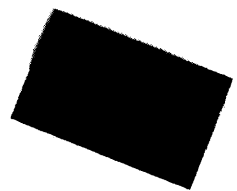
77. This CAFO constitutes the entire agreement between the parties.

**U.S. Environmental Protection
Agency, Complainant**

Date:

8/4/03

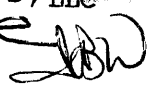

Cheryl Newton, Acting Director
Air and Radiation Division
U.S. Environmental Protection
Agency, Region 5 (A-18J)



CAFO-05 2003-0011

CONSENT AGREEMENT AND FINAL ORDER

Superior Aluminum Alloys, LLC

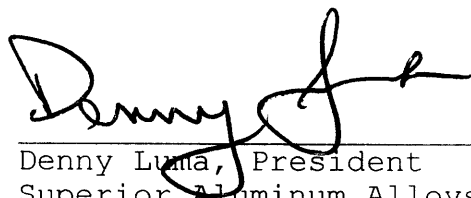
Docket No. ~~CAA-5-2002~~ 

CAA-05- 2003-0011

Superior Aluminum Alloys, LLC,
Respondent

Date: 7/17/03

By:



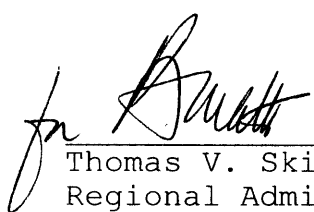
Denny Luma, President
Superior Aluminum Alloys, LLC

CONSENT AGREEMENT AND FINAL ORDER
Superior Aluminum Alloys, LLC
Docket No.

CAA-05- 2003-0 011
Final Order

It is ordered as agreed to by the parties and as stated in the Consent Agreement, effective immediately upon filing of this Consent Agreement and Final Order with the Regional Hearing Clerk.

Dated: 8/5/03



Thomas V. Skinner
Regional Administrator
U.S. Environmental Protection
Agency, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

ATTACHMENT A

Superior Aluminum Alloys, LLC will implement a SEP to reduce NOx emissions and natural gas consumption in three of its melting furnaces and its thermal chip dryer. A major component of the system will be a new waste heat recuperator in the discharge gas stream of the existing thermal chip dryer. The exhaust gases from the chip dryer afterburner will pass over recuperator tubes and transfer heat to the cold air inside the tubes.

This air will be drawn through a pre-filter housing and across a U-tube heat exchanger. From there it will be ducted to the inlet of a large pressure blower capable of delivering 25,000 cfm at 20 ounces pressure. This air will pass through the tubes of the recuperator and into a large insulated plenum. The preheated combustion air will be ducted through the plenum and to the burners on the dryer and three melting furnaces. The existing burners will have retrofit packages and controls installed to increase the products-of-combustion recirculation rate at the edges of the flames.

The SEP has the potential to reduce natural gas consumption rates approximately 10 %, while allowing equal melt rates to be achieved in the furnace. The SEP is also expected to provide a 30 to 50 % decrease in NOx formation rates at the burner when firing at 14 MMBTUs per hour, and 2000 degrees F. furnace temperature.

While the timeline is subject to change based on vendor supplies, construction scheduling and the execution date of this CAFO, SAA anticipates completing detailed design work by September 2003 and ordering the equipment by the end of 2003. Pursuant to the CAFO's terms, a report on SEP construction progress will be submitted by early January 2004. SAA anticipates installing components as they become available, but SEP installation should be complete by June 2004. System startup will occur by July 2004.

In the Matter of Superior Aluminum Alloys
Docket No:

CAA-05- 2003-0 011

CERTIFICATE OF SERVICE

I, Betty Williams, certify that I hand delivered the original of the Consent Agreement and Final Order, docket number CAA-05-2003-0011 to the Regional Hearing Clerk, Region 5, United States Environmental Protection Agency, and that I mailed correct copies by first-class, postage prepaid, certified mail, return receipt requested, to Superior Aluminum Alloys and Superior Aluminum Alloy's Counsel by placing them in the custody of the United States Postal Service addressed as follows:

Denny Luma, President
Superior Aluminum Alloys
P.O. Box 678
Edgerton Road 14214
New Haven, Indiana 46774

David L. Hatchett, Esq.
Baker and Daniels
300 North Meridian Street
Suite 2700
Indianapolis, Indiana 46204-1782

US
POSTAL
SERVICE
RECEIVED


03 AUG -6 PM 2:53

RECEIVED
REGIONAL
CLERK

I also certify that a copy of the CAFO was sent by First Class Mail to:

David McIver, Chief
Office of Enforcement Air Section
Indiana Department of Environmental Management
100 North Senate Avenue, Room 1001
Indianapolis, Indiana 46206-6015

on the 6th day of August, 2003.


Betty Williams, Secretary
AECAS (IL/IN)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 0178 4001